

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEMETRIUS JOHNSON,

*Plaintiff,*

v.

REYNALDO GUEVARA, the ESTATE of  
ERNEST HALVERSON, DARRYL DALEY,  
WILLIAM ERICKSON, JOHN HEALY, and  
the CITY OF CHICAGO

*Defendants.*

Case No. 20-cv-4156

Judge Sara L. Ellis

Magistrate Judge Heather K. McShain

**JURY TRIAL DEMANDED**

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME**

Plaintiff, DEMETRIUS JOHNSON, by and through his attorneys, LOEVY & LOEVY, hereby moves the Court for an extension of time to make disclosures of expert witnesses pursuant to Rule 26(a)(2). Plaintiff has consulted with counsel for the Defendants, who do not oppose this motion.

In support of his motion Plaintiff states:

1. Plaintiff filed this case in November 2020. Dkt 1.
2. The Court's November 1, 2022 scheduling order provides that Plaintiff's Rule 26(a)(2) disclosures are to be served on December 30, 2022. Dkt. 175.
3. Plaintiff's counsel has been litigating this matter diligently, including the completion of fact discovery; filing an affirmative motion for summary judgment; and identifying experts in the specialized fields involved in this case.

4. In light of other previously-set deadlines in this and other cases as well as the holidays, Plaintiff requests an extension to serve his expert disclosures.

5. This is Plaintiff's first request for an extension of the discovery schedule.

6. Plaintiff's counsel has contacted the defendants, who do not oppose Plaintiff's request, subject to corresponding extensions of the remaining expert discovery and Defendants' dispositive motion deadlines in this case.

7. In light of the foregoing, Plaintiff respectfully submits there is good cause to extend the deadlines set forth in Dkt. 175 as follows:

- Plaintiff's Rule 26(a)(2) disclosures: January 30, 2023
- Depositions of Plaintiff's experts: March 30, 2023
- Defendants' Rule 26(a)(2) disclosures: May 1, 2023
- Depositions of Defendants' experts: June 26, 2023
- Defendants' motion for summary judgment: July 31, 2023
- Plaintiff's response to Defendants' motion for summary judgment: August 28, 2023
- Defendants' reply for their motion for summary judgment: September 11, 2023

**WHEREFORE**, Plaintiff respectfully requests the court enter an order extending deadlines in this matter, as set forth in Paragraph 7 of this motion.

RESPECTFULLY SUBMITTED,

/s/ Danielle Hamilton  
*Counsel for Plaintiff*

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**CERTIFICATE OF SERVICE**

I, Danielle Hamilton, an attorney, certify that on December 19, 2022, I filed the foregoing pleading using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ Danielle Hamilton  
*One of Plaintiff's Attorneys*